



American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

April 12, 2006

RE: FCC ID: APYNAR0060_ATCB003374
Attention: Keijiro Kumagai / Hironobu Shimoji

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

1. Please provide a photo of GSM module with the shield removed.
2. Please note that the confidentiality request only mentions the BT operational description. The operational description for the GSM portion is therefore not covered under confidentiality. If this exhibit is desired to be under confidentiality, please provide a revised request for confidentiality that includes the GSM operational description.
3. Please note that while the temporary confidentiality request mentions the test setup photos, these photos also appear in the test report which cannot be held confidential. Consequently, the test setup photos will be public view. If the test setup photos are to be short term confidentiality exhibits, please remove them from the test reports and provide them only as separate exhibits.
4. FYI – no action needed unless intent is otherwise. Please note that as the manual does not give a separation distance and a caution about not using metallic accessories, the only accessory useable for this device will be the provided accessory. This will be listed on the grant. Please note that this grant note will restrict use of this device to ONLY that body worn accessory. If inclusion of third party accessories is desired, please retest SAR and specify accessories not containing metal at a specified distance in the manual.
5. Please note that the test setup photos show tape is being used to hold the device in a particular axis. However, the electrical characteristics of this tape have not been defined. Please confirm that the tape used is electrically 'invisible' at all frequency ranges tested (e.g. show evidence that the tape has not EMC characteristics). If this cannot be done, please retest using some other form of support which does not include possible EMC interference problems.
6. Please note that the operational description for the GSM module states that it has EDGE capability. Please note that the test data is not specific enough to determine which modulation scheme was tested. The data appears to be GSM and not EDGE. As such the report does not appear to address EDGE technology. Please either provide the test data for EDGE or please explain how this function is disabled in the device as sold in the US. Please note that this applies to both the 850MHz and 1900MHz frequency ranges.
7. FYI – no action needed. Please note that the title of the IC cross reference for GSM 850 states RSS128, yet the actual cross reference is correctly RSS132.
8. Please note that while it may be a more conservative measurement to add the BT SAR to the GSM SAR for a total SAR value, this is not the accepted FCC procedure for TCB approval. Please note that the FCC has stated that the acceptable method for this type device is simply to turn the BT device on for the worse case SAR and provide the resultant SAR level. Please provide data in accordance with the acceptable FCC procedures for TCB approval.

Dennis Ward
<mailto:dward@AmericanTCB.com>

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.